

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

| | | |
|-------------------------------|---|---|
| NETLIST, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 2:22-cv-293-JRG |
| vs. |) | |
| |) | JURY TRIAL DEMANDED |
| SAMSUNG ELECTRONICS CO., LTD; |) | (Lead Case) |
| SAMSUNG ELECTRONICS AMERICA, |) | |
| INC.; SAMSUNG SEMICONDUCTOR |) | <div style="background-color: black; width: 150px; height: 1.2em;"></div> |
| INC., |) | |
| |) | |
| Defendants. |) | |

| | | |
|--------------------------|---|--------------------------|
| NETLIST, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 2:22-cv-294-JRG |
| vs. |) | |
| |) | JURY TRIAL DEMANDED |
| MICRON TECHNOLOGY, INC.; |) | |
| MICRON SEMICONDUCTOR |) | |
| PRODUCTS, INC.; MICRON |) | |
| TECHNOLOGY TEXAS LLC, |) | |
| |) | |
| Defendants. |) | |

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S
OPPOSITION TO SAMSUNG'S *DAUBERT* MOTION TO STRIKE EXPERT
TESTIMONY OF DR. ANDREAS GROEHN**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Opposition to Samsung’s *Daubert* Motion to Strike Expert Testimony of Dr. Andreas Groehn. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of Exhibit I to the November 21, 2023 Opening Report of Dr. William Mangione-Smith in Case No. 22-CV-293-JRG.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the December 21, 2023 Rebuttal Expert Report of Lauren R. Kindler, in Case No. 22-CV-293-JRG.

4. Attached as **Exhibit 3** is a true and correct copy of the December 21, 2023 Rebuttal Expert Report of Dr. M. Ray Perryman, in Case No. 22-CV-293-JRG.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the transcript of the January 8, 2024 deposition of Dr. Andreas Groehn, taken in Civil Case No. 22-CV-293-JRG.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby